

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA
Title III

No. 17 BK 3283-LTS
(Jointly Administered)

**INFORMATIVE MOTION
OF FINANCIAL GUARANTY INSURANCE COMPANY
FOR APPEARANCE AT JULY 24-25, 2019, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Financial Guaranty Insurance Company (“**FGIC**”), by and through its attorneys, Rexach & Picó, CSP and Butler Snow LLP, files this *Informative Motion of Financial Guaranty Insurance Company for Appearance at July 24-25, 2019, Omnibus Hearing*. In support of the Motion, FGIC respectfully states as follows:

1. Martin A. Sosland, María Emilia Picó and Jason W. Callen intend to appear on behalf of FGIC at the Hearing¹ in Courtroom 3 of the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 on the following items:

Case No. 17-bk-3283

- a. *Ambac Assurance Corporation’s Motion and Memorandum of Law in Support of Its Motion Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds* [Dkt. # 7176].

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms as in that certain *Order Regarding Procedures for Attendance, Participation and Observation of July 24-25, 2019, Omnibus Hearing* [Case No. 17-3283, Dkt. # 7963] (the “**Order**”).

- i. *Financial Guaranty Insurance Company's Joinder in Ambac's Motion Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds* [Dkt. # 7546].
 - ii. *Ambac Assurance Corporation and Financial Guaranty Insurance Company's Reply Memorandum of Law in Support of Their Motion Concerning Application of the Automatic Stay to the Revenues Securing PRIFA Rum Tax Bonds* [Dkt. # 8022].
- b. *Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning PRIFA Rum Taxes* [Dkt. # 7328].
 - i. *Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning PRIFA Rum Taxes* [Dkt. # 7676].
 - ii. *Ambac Assurance Corporation's Reply in Further Support of Its Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning PRIFA Rum Taxes* [Dkt. # 8029].
 1. *Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Reply in Further Support of Its Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning PRIFA Rum Taxes* [Dkt. # 8032].

Case No. 19-adv-0291

c. *Plaintiffs and Debtors The Commonwealth of Puerto Rico's and the Puerto Rico Highways and Transportation Authority's (Through Their Respective Sole Representative the FOMB) Status Report and Proposed Case Management Order in Connection with Adversary Proceedings Numbers 19-291, 19-292, 19-293, 19-294, 19-295, 19-296, and 19-297* [Dkt. # 019] [also filed as Dkt. # 8055 in Case No. 17-bk-3283].

i. *Superseding Status Report of the Debtors and Alternative Proposed Case Management Orders of Debtors and Certain Defendants in Connection With Adversary Proceeding Numbers 19-291, 19-292, 19-293, 19-294, 19-295, 19-296, and 19-297.* [Dkt. # 020] [also filed as Dkt. # 8083 in Case No. 17-bk-3283].

Case No. 19-adv-0363

d. *Plaintiffs and Debtors The Commonwealth of Puerto Rico's and the Puerto Rico Highways and Transportation Authority's (Through Their Respective Sole Representative the FOMB) Status Report and Proposed Case Management Order in Connection with Adversary Proceedings Numbers 19-362, 19-363, 19-364, and 19-365* [Dkt. # 023].

i. *Superseding Status Report of the Debtors and Alternative Proposed Case Management Orders of Debtors and Certain Defendants in Connection With Adversary Proceeding Numbers 19-362, 19-363, 19-364, and 19-365* [Dkt. # 024] and [also filed as Dkt. # 613 in Case No. 17-bk-3567].

- e. All filings in response to Judge Dein's June 13, 2019 Order [Dkt. # 6 in Adv. No. 19-363 and Dkt. # 583 in Bk. No. 17-3567] and in response or related to the *Superseding Status Report of the Debtors and Alternative Proposed Case Management Orders of Debtors and Certain Defendants in Connection With Adversary Proceeding Numbers 19-291, 19-292, 19-293, 19-294, 19-295, 19-296, and 19-297*. [Dkt. # 020 in Adv. No. 19-291] and *Superseding Status Report of the Debtors and Alternative Proposed Case Management Orders of Debtors and Certain Defendants in Connection With Adversary Proceeding Numbers 19-362, 19-363, 19-364, and 19-365* [Dkt. # 024 in Adv. No. 19-363].
- f. Any objections, responses, statements, joinders, or replies to any of the foregoing pleadings.

2. Further, Martin A. Sosland, María Emilia Picó and Jason W. Callen also reserve the right to present argument or respond to any agenda item, matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

Dated: July 18, 2019.

Respectfully submitted,

REXACH & PICÓ, CSP

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*Attorneys for Financial Guaranty Insurance
Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will notify case participants.

Dated: July 18, 2019.

Respectfully submitted,

By: /s/ Martin A. Sosland

Martin A. Sosland

*Attorney for Financial Guaranty Insurance
Company*